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6 Attorney for Plaintiff
7 MARK D. DAVIS

8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA-LOS ANGELES

10 MARK D. DAVIS,
11 Plaintiff,

12 vs.

13
14 DAVIDSON HOTEL COMPANY, LLC, a
15 Delaware limited liability company;
16 TOM HARWELL, an individual; and
17 DOES 1-50, inclusive,
18 Defendants

} Case No: CV12-06327 CAS (AJWx)
JUDGE: HON CHRISTINA A. SNYDER

} **DECLARATION OF CHARLES L.
MURRAY III IN SUPPORT
OPPOSITION TO DEFENDANTS
MOITON IN LIMINE TO EXCLUDE
WITNESSES AND EVIDENCE OF
DISCRIMINATION**

19
20 **DECLARATION OF CHARLES L. MURRAY III**

21 I, Charles L. Murray III, declare as follows:

- 22 1. I am counsel of record for Plaintiff MARK D. DAVIS ("DAVIS") in this case.
23 2. I am a member in good standing of the State Bar of California and have
24 been admitted to practice before this Federal Court in the Central District
25 of California. This declaration is submitted in support of Plaintiff's
26 Opposition to Defendants *Motion in Limine to Exclude Testimony and*
27 *Witnesses*.
28 3. I have personal knowledge of the facts set forth below and if called as a

1 witness, I could and would testify to these same facts under oath.

2 4. On October 17, 2012, Plaintiff's initial disclosures included the identity of
3 TRACY WARD, MOHAMMAD GHAZIZADEH, AND LEILA CLAIRK and
4 their knowledge as to the hostile work environment and harassment of
5 TRACY WARD.

6 5. Defendants conducted no depositions nor any discovery relating to
7 TRACY WARD, MOHAMMAD GHAZIZADEH, AND LEILA CLAIRK.

8 6. I understand this declaration is under the penalty of perjury, and I do not
9 want to misrepresent anything. I am certain that at the pre-trial
10 conference on May 21, 2013 I informed Ms. Fromholz that I was reserving
11 my rights to call all witnesses and use all exhibits in my pre-trial
12 disclosures. I have been to trial many times, and I would never preclude
13 any witness or documents at such an early stage.

14 7. Plaintiff's Initial Trial disclosures on October 17, 2012, pursuant to R. 26,
15 designated Leila Clark and Mohamad Ghazizadeh.

16 8. Plaintiff's Rule 16-4 Witness List designating Leila Clark and Mohamad
17 Ghazizadeh as witnesses

18
19 Executed on June 24, 2013 in Los Angeles, California.

20
21 I declare under penalty of perjury under the laws of the United States that
22 the foregoing is true and correct to the best of my knowledge and
23 understanding.

24
25 

26
27 _____
Charles L. Murray III